

Thomas L. Gambaro
Email: thom.gambaro@gmail.com
P.O. Box 14741
Portland, Oregon 97293-0741
Telephone: 503-544-0589

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

FLIR SYSTEMS, INC., an Oregon corporation,

Plaintiff,

v.

THOMAS L. GAMBARO, an individual;
and **MOTIONLESS KEYBOARD COMPANY**, an Oregon corporation

Defendants.

Case No. CV 10-0231-BR

**MOTION FOR RECONSIDERATION
OF RULE 37 (a)(1) COMPELLING
FLIR DISCOVERY**

DEMAND FOR JURY TRIAL

DEFENDANT PRO SE MOTION FOR EXTENSION OF TIME

Pursuant to Rule 37 (a)(1) the Defendant Pro Se respectfully requests the court issue an order to compel partial discovery specifically the previously denied by Plaintiff FLIR specified as the "Assembly CAD files for the Accused Products" that Defendant Pro Se requires to present a complete defense and in the Defendant Cross Motion for Partial Summary Judgment. Pursuant to Local Rule 7-1 there have been numerous meetings and conferences resulting in consistent denials for discovery for defense.

MOTION FOR RECONSIDERATION OF RULE 37 (a)(1) COMPELLING FLIR DISCOVERY

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This motion is supported by the Declaration of Thomas L. Gambaro in support of the motions relating to Partial Summary Judgment. This request is made in the interest of justice to bring balance to the issues relating to the facts relating to the claim construction at issue from the *Motionless Keyboard Company v. Microsoft Corporation et al* case.

Dated: September 29, 2010

Respectfully submitted,

By: _____
Thomas L. Gambaro

Email: thom.gambaro@gmail.com
P.O. Box 14741
Portland, Oregon 97293-0741
Telephone: 503-544-0589

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 29, 2010, a true copy of the foregoing **MOTION FOR RECONSIDERATION OF RULE 37 (a)(1) COMPELLING FLIR DISCOVERY** was served to the following counsel by hand delivery, electronic filing via e-mail with electronic signature and first class mail:

James L. Buchal, OSB 921618

jlbuchal@ambjlp.com

Murphy & Buchal LLP

2000 SW First Avenue, Suite 420

Portland, OR 97201

Tel: 503-227-1011x3

Fax: 503-227-1034

Attorney for Defendant Motionless Keyboard Company

Susan D. Marmaduke, OSB 841458

susan.marmaduke@harrang.com

Sivhwa Go, OSB 033252

hwa.go@harrang.com

HARRANG LONG GARY RUDNICK P.C.

1001 SW FIFTH AVENUE, 16TH FLOOR

PORLTAND, OREGON 97204

Telephone: 503-242-0000

Facsimile: 503-241-1458

William A. Brewer III, *Admitted Pro Hac Vice*

wab@bickelbrewer.com

Michael J. Collins, *Admitted Pro Hac Vice*

mjc@bickelbrewer.com

Farooq A. Tayab, *Admitted Pro Hac Vice*

fat@bickelbrewer.com

BICKEL & BREWER

4800 Commercial Bank Tower

1717 Main Street

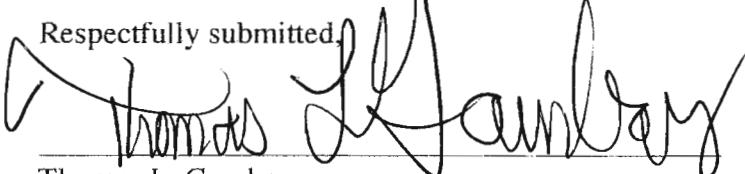
Dallas, TX 75201-4612

Telephone: 214-653-4000

Fax: 214-653-1015

Attorneys for Plaintiff FLIR Systems, Inc.

Respectfully submitted,



Thomas L. Gambaro

P.O. Box 14741

Portland, Oregon 97293-0741

Telephone: 503-544-0589

Email: thom.gambaro@gmail.com

September 29, 2010 By: